

Exhibit 1

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

WAYMO LLC,)
Plaintiff,)
vs.) Case No.
UBER TECHNOLOGIES, INC.,) 3:17-cv-00939-WHA
OTTOMOTTO LLC; OTTO)
TRUCKING LLC,)
Defendants.)
_____)

HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

CONTINUED VIDEOTAPED DEPOSITION OF GAETAN PENNECOT
San Francisco, California
Wednesday, June 14, 2017
Volume II

Reported by:

SUZANNE F. GUDELJ, CSR No. 5111

Job No. 2638084

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Continued Videotaped Deposition of GAETAN PENNECOT,
Volume II, taken on behalf of Plaintiff Waymo
LLC, at the Law Offices of Quinn Emanuel
Urquhart & Sullivan LLP, 50 California Street,
22nd Floor, San Francisco, California,
beginning at 9:13 a.m., and ending at 4:38 p.m.
a.m., on Wednesday, June 14, 2017, before
SUZANNE F. GUDELJ, Certified Shorthand Reporter
No. 5111.

1 A This is correct.

2 Q They're the manufacturer of the FAC lens
3 for the Fuji LiDAR, right?

4 A This is correct.

5 Q At your last deposition we talked about in 02:37:56
6 GBR3 how the diodes [REDACTED]

7 [REDACTED]; do you recall that?

8 A Yes.

9 Q And we -- we talked about how in Fuji the
10 diodes [REDACTED] is that right? 02:38:12

11 A This is correct.

12 Q Who came up with [REDACTED]

13 [REDACTED] on the Fuji PCBs?

14 A I did.

15 Q What did you look at to come up with that? 02:38:24

16 A It's from a previous experience.

17 Q When you say "previous experience," what
18 are you referring to?

19 A It's my experience in the past at Google.

20 Q Talking about your -- the beam angles that 02:38:42
21 you got from Mr. Boehmke -- switching topics a
22 little bit.

23 A Yeah.

24 [REDACTED]

25 [REDACTED] 02:38:58

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Defendants.

/

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VIDEOTAPED DEPOSITION OF GAETAN PENNECOT
VOLUME III (PAGES 275 to 478)
FRIDAY, JUNE 16, 2017

Reported by:

Anrae Wimberley

CSR No. 7778

Job No. 2641228

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Transcript of video-recorded deposition
of GAETAN PENNECOT, taken at Quinn Emanuel
Urquhart & Sullivan LLP, 50 California Street,
22nd Floor, San Francisco, California 94111,
beginning at 10:15 a.m. and ending at 5:25 p.m. on
Friday, June 16, 2017, before Anrae Wimberley,
Certified Shorthand Reporter No. 7778.

1 A. "You should do it yourself." 15:53:03

2 Q. Was [REDACTED] a supplier of FAC lenses? 15:53:08

3 A. No. 15:53:08

4 Q. And so what information did [REDACTED] have about 15:53:16

5 FAC lenses that they provided to you? 15:53:19

6 A. They had like an optical engineer that could 15:53:25

7 optimize FAC lens pretty easy. I remember they 15:53:36

8 suggested [REDACTED] [REDACTED]

9 [REDACTED] [REDACTED] [REDACTED]

10 [REDACTED] [REDACTED]

11 Q. I want to switch to a different topic. 15:54:16

12 Did you use [REDACTED] in connection with your 15:54:20

13 work on transmit boards for Fuji? 15:54:23

14 A. Yes. 15:54:23

15 Q. And what are [REDACTED] 15:54:26

16 A. [REDACTED] are very common in mechanical 15:54:29

17 engineering. [REDACTED] [REDACTED]

18 [REDACTED] 15:54:39

19 Q. What did you use the [REDACTED] for in connection 15:54:42

20 with the Fuji transmit boards? 15:54:45

21 A. I used the [REDACTED] [REDACTED]

22 [REDACTED] [REDACTED]

23 [REDACTED] [REDACTED]

24 Q. Can you explain a little more how you did 15:54:59

25 that. 15:55:00

1 A. So [REDACTED] 15:55:03
2 [REDACTED] 15:55:08
3 [REDACTED] [REDACTED]
4 [REDACTED] [REDACTED] 15:55:17
5 [REDACTED] 15:55:21
6 [REDACTED] 15:55:24
7 [REDACTED] 15:55:29
8 [REDACTED] 15:55:34
9 [REDACTED] 15:55:37
10 [REDACTED] 15:55:43
11 [REDACTED] 15:55:48
12 [REDACTED] 15:55:51
13 [REDACTED] 15:55:56
14 [REDACTED] 15:56:00
15 [REDACTED] 15:56:05
16 [REDACTED] 15:56:09
17 [REDACTED] 15:56:12
18 Q. While you were at Google, did you also use 15:56:14
19 [REDACTED] in connection with transmit boards? 15:56:17
20 A. Yes. 15:56:17
21 Q. And how did you use [REDACTED] in connection with 15:56:21
22 transmit boards at Google? 15:56:23
23 A. The same way. 15:56:24
24 Q. Now, prior to your work at Google, did you 15:56:27
25 know about how to use [REDACTED] in engineering? 15:56:31